

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIADONALD L. Mastier, Jr.
PLAINTIFF

VS.

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIAAPR - 9
2008

FILED

(CIVIL ACTION NO. 05-180-(ERIE))

Federal Bureau of Prisons et al., Motion for Appointment of
WARDEN, James Sherman; Counsel
DR. H. Beam; DR. Olson; DR. Smith
Defendant's

PURSUANT TO 28 USC §1915 (e)(1) Plaintiff moves for
AN ORDER APPOINTING COUNSEL TO REPRESENT HIM IN THIS CASE, IN
SUPPORT OF THIS MOTION, Plaintiff states;

1. Plaintiff is unable to afford counsel, he has requested
leave to proceed in forma pauperis.

2. Plaintiff's imprisonment will greatly limit his ability
to litigate, the issues involved in this case are complex, and
will require significant research and investigation.

Plaintiff has limited knowledge of the law, which the
Government has so far taken advantage of knowing

Full well plaintiff's hands are tied and plaintiff don't know nothing about the law, or how to file the proper motions, knows plaintiff can't retrieve very vital evidence, or find a expert witness, such as the U.S Government has and Relys on mostly for there white case, instead of all the facts presented by plaintiff.

3. A trial in this case will produce conflicting testimony, plaintiff must have counsel to present evidence and crossexamine witnesses, to bring out all the true facts, plaintiff had his amendment dismissed because he didn't inform the courts why he didn't file his administrative remedy, which was because plaintiff was locked into shu, and could not get the proper forms, and I was transferred right after my surgery I do

Understand its to late now.

4. plaintiff did make repeated efforts to obtain
counsel at this time plaintiff don't have any name's
or returned letters, do to the fact most all of his
papers were lost between two transfers.

5. wherefore, plaintiff request that the court appoint
attorney Gloria Gillman, 924 Cherry St, 5th Floor,
Philadelphia, PA 19107, Mrs. Gillman is an honorable
member of the Pennsylvania Bar, as counsel in this
case.

Respectfully submitted by:
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DONALD L MOSHER JR

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